

KENNETH W. BROTHERS, *admitted pro hac vice*
GARY M. HOFFMAN, *admitted pro hac vice*
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street, N.W.
Washington, DC 20037-1526
Telephone: (202) 785-9700
Facsimile: (202) 887-0689

EDWARD A. MEILMAN, *admitted pro hac vice*
Dickstein Shapiro Morin & Oshinsky, LLP
1177 Avenue of the Americas
New York, New York 10036-2714
Telephone: (212) 835-1400
Facsimile: (212) 997-9880

JEFFREY B. DEMAINE, State Bar No. 126715
JONATHAN WEISSGLASS, State Bar No. 185008
Altshuler, Berzon, Nussbaum, Rubin & Demain
177 Post Street, Suite 300
San Francisco, California 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064

Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SYNOPSYS, INC.,)	Case No. C03-02289 MJJ
)	
Plaintiff,)	DECLARATION OF KENJI
)	TAKIGUCHI IN SUPPORT OF
vs.)	DEFENDANT'S MOTION TO
)	DISMISS
RICOH COMPANY, LTD., a Japanese)	
corporation,)	Date: August 19, 2003
)	Time: 9:30 am
Defendant.)	Place: Courtroom 11, 19th Floor
)	The Honorable Martin J. Jenkins

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SYNOPSYS, INC.,

Plaintiff,

v.

RICOH COMPANY, LTD.,

Defendant.

Case No.: C03 02289

DECLARATION OF KENJI TAKIGUCHI IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS

1. My name is Kenji Takiguchi. I am the Deputy General Manager of Legal Division and the General Manager of Legal & IP Licensing Department of Ricoh Company, Limited ("RCL"). I am over the age of 21 and am competent to make this declaration. Based on my personal knowledge and information, I hereby declare to all of the facts in this declaration.
2. RCL is a Japanese corporation headquartered in Tokyo.
3. RCL is not incorporated in California.
4. RCL is not registered to do business in California.
5. RCL has no offices in California.
6. RCL has no designated agent authorized to accept service of legal process in California.
7. RCL does not make any products in California.
8. RCL has not purposefully availed itself to jurisdiction in California.
9. RCL has neither sued nor threatened to sue Synopsys on either the '432 or '016 patent. RCL has not and will not assert any such claims against Synopsys.

10. RCL unconditionally agrees not to sue Synopsys for infringement as to any claim of the '432 Patent and the '016 Patent based upon the products currently manufactured, sold, and used by Synopsys.
11. RCL has not and does not consent to the jurisdiction of the District Court of the Northern District of California for any action regarding the '432 Patent or the '016 Patent.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 14, 2003.

